

RECEIVED

SEP 22 2022
PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Eastern DIVISION

Nikki Giovanni Bellamy

(Enter above the full name
of the Plaintiff[s] in this
action).

vs.

East Carolina University
University of North Carolina System
Janice Lewis

Mark Sanders
William Gee

(Enter above the full name of
ALL Defendant[s] in this action.
Fed.R.Civ.P.10(a) requires that
the caption of the complaint
include the names of all the
parties. Merely listing one
party and "et al." is insufficient.
Please attach additional sheets if
necessary).

Case No.

4:22-cv-00115-D

(To be assigned
by the Clerk of
District Court)

COMPLAINT

1. Plaintiff resides at 1401 E 10th St Apt 133
Greenville, NC 27858

2. Defendant(s) name(s): East Carolina University
University of North Carolina System
Janice Lewis
Mark Sanders
William Gee

Location of principal office(s) of the named defendant(s):

Greenville, NC , Raleigh, NC

Nature of defendant(s) business:

education

Approximate number of individuals employed by defendant:

East Carolina University - 3000 UNC System

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) _____ Failure to employ me.
- (B) _____ Termination of my employment.
- (C) _____ Failure to promote me.
- (D) ☒ _____ Other acts as specified below:

5. Plaintiff is:

(A) ☒ presently employed by the defendant.

(B) ☐ not presently employed by the defendant.

The dates of employment were _____.

Employment was terminated because:

(1) ☐ plaintiff was discharged.

(2) ☐ plaintiff was laid off.

(3) ☐ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) ☒ my race.

(B) ☐ my religion.

(C) ☐ my sex.

(D) ☐ my national origin.

(E) ☒ other as specified below:

disability

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Jamice Lewis - Library director
Mark Sanders - Assistant director of
Access Services

William Gee Head of Circulation
and Interlibrary Loan Services

8. The alleged discrimination occurred on or about 06-2018,
October 2020 to 7-20-2021

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

I was discriminated against. I was
at the time the only minority in the
Circulation department. During 2018
my supervisor William Bee yelled at
me and told me if I was having
cognitive issue I needed to go out on
FMLA leave in front of several staff
members and students. I was retaliated
against while on FMLA leaving 2018
and 2018 subject to working against
accommodations set for me in 2019. During
the Pandemic 2020 to 2021 I was forced
to work in condition even though I was high risk
and the doctor stated this in add'l info.

10. The alleged illegal activity took place at: East
Carolina University

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 07-19-2021. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 06-24-2022.

12. I seek the following relief:

- (A) ☒ recovery of back pay;
- (B) ☐ reinstatement to my former job;
- (C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including
injunctive orders, damages, costs and attorney's fees.

09-22-2022

Date

John J. Giovanni Bellamy
Signature of Plaintiff

1401 E 10th St

Greenville, NC 27858

252-751-3682 / 252-451-0318

Address and Phone Number of Plaintiff